



1735 Market Street, 51st Floor  
Philadelphia, PA 19103-7599  
TEL 215.665.8500  
FAX 215.864.8999  
www.ballardspahr.com

Elizabeth Seidlin-Bernstein  
Tel: 215.988.9774  
Fax: 215.864.8999  
seidline@ballardspahr.com

September 15, 2021

*By Electronic Filing*

Honorable Petrese B. Tucker  
U.S. District Court for the  
Eastern District of Pennsylvania  
16613 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

Re: Lawrence v. DOAR, Inc., 21-CV-3269

Dear Judge Tucker:

Our firm represents defendant DOAR, Inc. in the above-referenced action. We write regarding DOAR's August 30, 2021 request for a stay of its deadlines to file motions under Federal Rule of Civil Procedure 12(b)(6) and any applicable state anti-SLAPP laws pending a ruling on its anticipated motion to dismiss for lack of personal jurisdiction and improper venue. *See* Dkt. No. 4. That deadline is September 28. The Court has not yet ruled on DOAR's request.

On September 8, plaintiff filed a letter responding to DOAR's request. *See* Dkt. No. 5. In that letter, plaintiff stated that she intends to seek jurisdictional discovery from DOAR and that she "agrees for a stay on any Rule 12 motions until" DOAR "fully responds" to those requests. *Id.* at 1. Plaintiff subsequently served a set of 22 wide-ranging jurisdictional discovery requests on DOAR. Those requests are premature, as DOAR has not even filed a motion and plaintiff has not requested the Court's permission to take jurisdictional discovery, which is a prerequisite to obtaining it.

In light of the upcoming deadline for DOAR to file motions under Rule 12(b)(6) and state anti-SLAPP laws, and given plaintiff's apparent agreement that the Court should first determine whether it has jurisdiction before briefing on the merits of her claims begins, DOAR respectfully requests that the Court enter the proposed order submitted with its August 30 request and stay the deadlines for filing Rule 12(b)(6) and anti-SLAPP motions so that the issues of personal jurisdiction and venue can be adjudicated first.

Honorable Petrese B. Tucker  
September 15, 2021  
Page 2

Thank you again for your consideration.

Respectfully submitted,

*/s/ Elizabeth Seidlin-Bernstein*

Elizabeth Seidlin-Bernstein

cc: Bruce L. Castor, Jr.